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Attorneys for Plaintiff Procaps Laboratories, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PROCAPS LABORATORIES, INC., a
Nevada Corporation,

Plaintiff,

v.

GH EXPRESS CALI INC., a foreign
corporation; MANJINDER KAUR dba GH
EXPRESS; DOES 1 through 10, inclusive; and
ROES 1 through 10, inclusive,

Defendants.

GH EXPRESS CALI, INC.; MANJINDER
KAUR dba GH EXPRESS,

Counterclaimants,

v.

PROCAPS LABORATORIES, INC.
Counter Defendant.

Case No. 2:21-cv-02016-JAD-BNW

**STIPULATION AND ORDER TO
EXTEND TIME FOR PROCAPS. TO
REPLY IN SUPPORT OF ITS
EMERGENCY MOTION FOR
PROTECTIVE ORDER REGARDING
DEFENDANTS' NOTICE OF
DEPOSITION OF ANDREW LESSMAN
(First Request)**

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1 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff PROCAPS
2 LABORATORIES, INC. (“Plaintiff” or “Procaps”) and Defendants GH Express Cali Inc. (“GH
3 Express”) and Manjinder Kaur dba GH Express’s (“Kaur”) (GH Express and Manjinder are
4 collectively referred to as “Defendants”), by and through their respective undersigned counsel of
5 record, as follows:

6 WHEREAS, Procaps Emergency Motion for Protective Order regarding Defendant’s
7 Notice of Deposition of Andrew Lessman (“Motion”) was filed on May 17, 2023;

8 WHEREAS, the Defendants filed their response to Plaintiff’s Motion on May 31, 2023;

9 WHEREAS, the Procaps’ deadline to file its reply in support of its Motion is due June 7,
10 2023;

11 WHEREAS, Defendants have agreed that Plaintiff may have an additional week in which
12 to reply in support of Plaintiff Motion to on or before June 14, 2023;

13 WHEREAS, there are no other deadlines affected by this stipulation that are presently
14 known to the parties; and

15 WHEREAS, Plaintiff’s counsel represents that this request is not for any improper purpose
16 or to delay;

1 THEREFORE, Plaintiff and Defendants hereby request order that Plaintiff has up through
2 and including June 14, 2023, in which to file its reply in support of Procaps' Emergency Motion
3 for Protective Order regarding Defendants' Notice of Deposition of Andrew Lessman.

4 Dated this 7th day of June 2023.

 Dated this 7th day of June 2023.

5 GREENE INFUSO, LLP

 THE REICH LAW FIRM

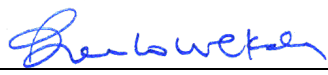
6
7 /s/ Michael V. Infuso
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12 Attorneys for Plaintiff
13 PROCAPS LABORATORIES, INC.

/s/ Jeff Reich
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 Attorneys for Defendants
 GH EXPRESS CALI, INC AND
 MANJINDER KAUR.

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15 **IT IS SO ORDERED:**

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18 United States Magistrate Judge

19 DATED: June 8, 2023
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